

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Cause No. 4:18-cr-00456-AGF-JMB |
| |) | |
| ANTOINETTE DORSEY, |) | |
| |) | |
| Defendant. |) | |

DEFENDANT'S MOTION TO REOPEN DETENTION HEARING

COMES NOW defendant, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to reopen the detention hearing in the above-referenced matter. In support of her request, defendant states as follows:

1. The detention hearing in this matter was waived by defendant before this Honorable Court on June 20, 2018 [Doc. 25].
2. At the time of defendant's waiver, defendant was also confined due to pending state charges in the matter of *State of Missouri v. Antoinette Dorsey*, Cause Number 1822-CR01886. Also at that time, defendant was unable to post bond on the state charges.
3. Subsequent to defendant's waiver of her detention hearing, the state criminal case referenced above was dismissed. Therefore, the posting of bond in a parallel state criminal case is no longer at issue with respect to her release from federal custody in the present matter before this Court.

4. Therefore, counsel for defendant respectfully requests that a detention hearing be set for September 12, 2018, at 9:00 a.m., so that counsel for defendant may provide additional arguments to the Court in support of defendant regarding the matter of detention.
5. The government has no objection to defendant's request to reopen the detention hearing.

WHEREFORE, with no objection from the government, defendant respectfully requests this Honorable Court reopen the detention hearing in the above-referenced matter on September 12, 2018, at 9:00 a.m.

Dated: September 7, 2018

Respectfully submitted,

/s/ Nicholas Williams

Nicholas Williams, #62617MO

KesslerWilliams, LLC

1401 Brentwood Boulevard, Suite 950

St. Louis, Missouri 63144

Phone: (314) 863-6363

Fax: (314) 727-2869

Attorney for Defendant Antoinette Dorsey

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of September, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney.

/s/ Nicholas Williams

Nicholas Williams